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August 24, 2022

Via ECF

The Honorable Analisa Torres
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

The Honorable Robert W. Lehrburger
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Joint Discovery Extension Request, or in the Alternative, Joint Request to Schedule an Earlier Settlement Conference in *TamarindArt, LLC v. Raisa Husain and Owais Husain as Administrators of the Estate of Maqbool Fida Husain*, No. 1:22-cv-595 (S.D.N.Y.)

Dear Judge Torres and Magistrate Judge Lehrburger:

We represent Defendants Raisa Husain and Owais Husain as Administrators of the Estate of Maqbool Fida Husain (“Defendants”). We write jointly on behalf of Defendants and Plaintiff Tamarind Art, LLC (collectively, the “Parties”), with Plaintiff’s consent, to request that the Court extend the close of fact discovery from September 26, 2022, to November 17, 2022, so that the parties can engage in the Settlement Conference before Magistrate Judge Lehrburger, which is currently scheduled for October 6, 2022, prior to the close of fact discovery and have sufficient time after that date to complete discovery if they fail to settle. Alternatively, the Parties request that the Settlement Conference be rescheduled to an earlier date as far in advance of the close of fact discovery as possible.

On August 8, 2022, the Parties requested that the Court reopen fact discovery because the Parties had been unable to reach an agreement in settlement negotiations; at the same time, they requested that the Court hold the Case Management Conference soon, to discuss scheduling and potential mediation (ECF No. 29). On August 10, 2022, the Court ordered the Parties to complete fact discovery by September 26, 2022; rescheduled the Case Management Conference to October 18, 2022; and referred this matter for a Settlement Conference before Magistrate Judge Lehrburger

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(ECF No. 31). On August 18, 2022, this Court scheduled a pre-Settlement Conference on September 13, 2022, and a Settlement Conference on October 6, 2022 (ECF Nos. 32-33).

In the last week, the Parties have reopened settlement negotiations. In light of this development, the Parties believe that it would be fruitful to participate in the Settlement Conference before Magistrate Judge Lehrburger well in advance of the close of fact discovery. This would allow them to focus their present efforts on settlement but still allow time to complete discovery if those efforts fail. Further, if the Court grants Plaintiff's motion for leave to amend (ECF No. 34), the Parties will require additional time for Defendant to answer the amended complaint before engaging in discovery. Accordingly, the Parties respectfully request that the close of fact discovery be extended to November 17, 2022; alternatively, the Parties request an earlier date for the Settlement Conference prior to the current close of fact discovery.

We thank the Court for its consideration.

Respectfully,

By: /s/ James Rosenfeld
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